YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
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(530)757-3650

TITLE V PERMIT STATEMENT OF BASIS ADDENDUM

PERMIT NUMBER: F-00254-4

ENGINEER: Nancy Fletcher

DATE: July 24, 2009

Facility Name:	Truck Accessories Goup, LLC dba Leer West
Mailing Address:	1686 East Beamer Street Woodland, CA 95776
Location:	1686 East Beamer Street Woodland, CA
Responsible Official:	Thomas Daly
Title:	General Manager
Application Contact:	Gustavo Gonzalez
Phone:	1.800.444.5337

I. Facility Description

Truck Accessories Group, LLC dba Leer West, manufactures and assembles truck caps and tonneau covers. The two major processes in the manufacturing of the caps are the fabrication of the cap and the painting of the cap. The caps are made by a process in which gel coat, ceramic resin, and fiberglass reinforced polyester resin are used to fabricate the cap. The painting occurs by use of a base coat/clear coat system with booth heaters used for drying. The painting is now controlled by a rotor concentrator catalytic oxidizer (RCCO). The RCCO was installed in early 2005 to control the emissions from all painting processes at the facility. The modification to the painting permits was noticed under a previous action. The RCCO has been tested and the final permits were issued. The support processes at the facility include adhesives application for the attachment of headliner carpet and various seals, combustion units for space heating, paint preparation activities, and cutting, sanding, and grinding of the unpainted caps. The facility is planning to supplement the fiberglass production with aluminum cabs. The facility will use the same process and equipment to coat aluminum cabs in addition to the fiberglass camper shells.

II. Proposed Revisions

The facility is proposing a minor Title V Permit modification to modify the process description for permits P-108-91(a2) and P-23-93(a1). The process descriptions previously limited the facility to the painting of fiberglass reinforced plastic camper shells. However, the operation was considered a motor vehicle and mobile equipment coating operation and subject to Rule 2.26, Motor Vehicle and Mobile Equipment Coating Operations, requirements. The facility is proposing to update the description so the facility can paint aluminum camper shells in addition to the plastic shells. The process description would be updated to read `Coating Operation: Automotive'. The facility is not proposing to make any changes to the coating process, equipment or throughput. The facility would still be subject to the same District Rules and Regulations. The District has a metal coating rule however, the facility will not be subject to the requirements because the rule has an exemption for operations subject to Rule 2.26. In addition Rules 2.26, Motor Vehicle and Mobile Equipment Coating Operations, and 2.31 Surface Preparation and cleanup were revised since the last Title V permit modification. Therefore, the requirements for these rules will be updated for consistency with the revisions. This addendum to the Title V Statement of Basis reflects only the Title V Permit modifications proposed by Authority to Construct (ATC) applications C-09-143 and C-09-144 for the modification to the process descriptions of P-108-91(a2) and P-23-93(a1) respectively. Any emission units not affected by the proposed changes were previously evaluated and will not be included in this document.

III. Significant Emissions Unit Information

Each of the sources has been constructed pursuant to issuance of an authority to construct in accordance with District Rules 3.1 and 3.4.

Identification Number: **P-108-91(a3)**, Repair and Re-work Paint Booth

Equipment Description: 19' x 12 ' x 28' paint spray booth with HVLP gun(s), enclosed gun washer, and one (1) 1 MMBtu/hr natural gas fired heater

Control Equipment: Munters rotor concentrator catalytic oxidizer (RCCO), model #IZS-3546-CT, serial #TBD, serving paint booth, and shared with P-108-91(a1). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer; dry filter system integral to RCCO

Identification Number: **P-23-93(a2)**, Main Paint Booth

Equipment Description: 8' x 25 ' x 116' paint spray booth with HVLP gun(s), enclosed gun washer, one (1) 2 MMBtu/hr natural gas fired heater, and one (1) 1 MMBtu/hr natural gas fired heater

Control Equipment: Munters rotor concentrator catalytic oxidizer (RCCO), model #IZS-3546-CT, serial #TBD, serving paint booth, and shared with P-108-91(a1). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer; dry filter system integral to RCCO

IV. Title V Applicability

The facility potential to emit exceeds the Title V threshold of 25 tons per year of VOC and is subject to the requirements of District Rule 3.8. The facility emission totals are listed below:

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	**VOC**	**CO**	**NO_x**	**SO_x**	**PM_{10}**
P-108-91(a3) & P-23-93(a2)*	10.00	1.98	2.37	0.02	1.52
Previous Facility Total	66.49	3.46	4.13	0.03	11.43
New Facility Total	66.49	3.46	4.13	0.03	11.43

* Combined emissions from both permits. The permits have a combined emissions cap and a fuel usage cap.

V. APPLICABLE FEDERAL REQUIREMENTS

RULE 2.3 Ringelmann Chart

Rule Description

This rule specifies the allowable opacity limit for sources in the District.

Compliance Status

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

Streamlining Demonstration

For several emissions units, the requirements of the rule can be streamlined by a condition required by District Rule 3.4 (New Source Review). The streamlining demonstration is shown below:

Streamlined Requirement: The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

a. As dark or darker in shade as that designated as No. 2 on the Ringlemann Chart as published by the United States Bureau of Mines; or

b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

The District Rule 3.4 requirement on P-108-91(a3)/C-09-143 is:

The Permit Holder shall not discharge into the atmosphere, from the control system stack, any air contaminant for a period or periods aggregating to more than three (3) minutes in any one (1) hour which is:

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4]

The Rule 2.3 requirement is streamlined by the New Source Review requirement for P-108-91(a3)/C-09-143.

Streamlined Requirement: The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

a. As dark or darker in shade as that designated as No. 2 on the Ringlemann Chart as published by the United States Bureau of Mines; or

b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

The District Rule 3.4 requirement on P-23-93(a2)/C-09-144 is:

The Permit Holder shall not discharge into the atmosphere, from the control equipment exhaust, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:
a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4]

The Rule 2.3 requirement is streamlined by the New Source Review requirement for P-23-93(a2)/C-09-144.

RULE 2.5 Nuisance

Rule Description

This rule requires that sources are not a public nuisance.

Compliance Status

The rule applies to the modified emissions units at the stationary source. The modifications are not expected to cause the facility to become a nuisance. The source is currently in compliance with the rule.

Permit Condition

The permit holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property.

[The above permit condition is federally enforceable because it is derived from District Rule 2.5 - Nuisance that is currently part of the California State Implementation Plan (SIP). The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only]

RULE 2.11 Particulate Matter

Rule Description

This rule specifies the allowable particulate matter emission rate at standard conditions.

Compliance Status

This rule applies to the following emission units at the source: P-108-91(a3)/C-09-143 (painting - R&R booth) P-23-93(a2)/C-09-144 (painting - main booth). The source is currently in compliance with the rule.

Streamlining Demonstration

The requirements of the rule can be streamlined by conditions required by District Rule 3.4 (New Source Review). The streamlining demonstration is shown below:

Streamlined Requirement: The Permit Holder shall not release or discharge into the atmosphere from any source, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 (painting - R&R booth) is 0.4 lb/day PM10 from combustion. The corresponding emission concentration is calculated below using the 2.4 mmBTU/hr rating for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.4 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/2.4 MMBtu * 60 min/hour = 0.006 gr/dscf

The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 (painting - R&R booth) is 5.4 lb/day PM 10 from spraying of paint (non-combustion). The AP-42 Appendix C PM10 fraction is 46.7%. The corresponding emission concentration is calculated below using the 48,000 cfm rating of the spray booth:

=5.4 lb PM10/day * 1/0.467 PM Fraction * 7,000 grains/lb * 1 day/24 hr * 1 min/48,000 cubic feet * 1 hour/60 min = 0.001 gr/dscf

0.006 gr/dscf + 0.001 gr/dscf = 0.007 gr/dscf total.

The Rule 2.11 requirements are streamlined by the New Source Review requirement.

Streamlined Requirement: The Permit Holder shall not release or discharge into the atmosphere from any source, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 (painting - main booth) is 0.2 lb/day PM10 from combustion. The corresponding emission concentration is calculated below using the 4.4 mmBTU/hr rating for the natural gas fired burners on the permits listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.8 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/4.4 MMBtu * 60 min/hour = 0.006 gr/dscf

The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 (painting - main booth) is 5.4 lb/day PM10 from spraying of paint. The AP-42 Appendix C PM10 fraction is 46.7%. The corresponding emission concentration is calculated below using the 42,500 cfm rating of the spray booth:

=5.4 lb PM10/day * 1/0.467 PM Fraction * 7,000 grains/lb * 1 day/24 hr * 1 min/48,000 cubic feet * 1 hour/60 min = 0.001 gr/dscf

0.006 gr/dscf + 0.001 gr/dscf = 0.007 gr/dscf total.

The Rule 2.11 requirements are streamlined by the New Source Review requirement.

Permit Condition

No permit conditions are required. All requirements of this rule have been streamlined by New Source Review requirements.

RULE 2.12 Specific Contaminants

Rule Description

This rule specifies the allowable sulfur dioxide emission rates at standard conditions.

Compliance Status

This rule applies to the following emissions units: P-108-91(a3)/C-09-143 (painting - R&R booth) and P-23-93(a2)/C-09-144 (painting - main booth). The source is currently in compliance with the rule.

Streamlining Demonstration

The requirements of the rule can be streamlined by conditions required by District Rule 3.4 (New Source Review). The requirements for particulate matter have been streamlined by the previous rule. The streamlining demonstration for sulfur dioxide is shown below:

Streamlined Requirement: The Permit Holder shall not release or discharge into the atmosphere from any single source a) sulfur dioxide in excess of 0.2 percent by volume; b) particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 is 0.03 lb/day SOx. The corresponding emission concentration is determined below using the 2.4 mmBTU/hr rating for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

$=0.03$ lb/day * day/24 hours * hour/2.4 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.00004%

The Rule 2.12 requirements are streamlined by the New Source Review requirements.

Streamlined Requirement: The Permit Holder shall not release or discharge into the atmosphere from any single source a) sulfur dioxide in excess of 0.2 percent by volume; b) particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 is 0.1 lb/day SOx. The corresponding emission concentration is determined below using the 4.4 mmBTU/hr ratings for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

$=0.1$ lb/day * day/24 hours * hour/4.4 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.00006%

The Rule 2.12 requirements are streamlined by the New Source Review requirements.

RULE 2.13 Organic Solvents

Rule Description

The purpose of this rule is to limit the emissions of organic solvents into the atmosphere that may result from the use of organic solvents.

Compliance Status

The following emissions sources are exempt from the rule pursuant to section 110.2 of the rule: P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth). Section 110.2 of the rule states that if the emission unit is already subject to other requirements for that emission unit, then the unit is exempt from the requirements of this rule. P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth) are subject to District Rule 2.26.

Permit Condition

No permit conditions are required.

RULE 2.17 Circumvention

Rule Description

This rule prevents sources from concealing emissions to the atmosphere.

Compliance Status

The rule is applicable to the modified emissions units at the facility. The source is currently in compliance with the rule.

Permit Condition

The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

RULE 2.26 Motor Vehicle and Mobile Equipment Coating Operations

Rule Description

The purpose of this rule is to limit the emission of volatile organic compounds from coating operations associated with motor vehicles, mobile equipment, and associated parts and components.

Compliance Status

This rule is applicable to both P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth). The facility is currently in compliance with the rule.

Streamlining Demonstration

One requirement of Rule 2.26 can be streamlined by conditions required by District Rule 2.34 (New Source Review). The streamlining demonstration for solvent VOC content is shown below:

Streamlined Requirements: The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content, as calculated pursuant to Section 605 (regulatory VOC content per volume of coating shall be calculated less water and less exempt compounds), in excess of the following limits, except as provided in Section 305 (emission control system): [District Rule 2.26, §302]

COATING CATEGORY	REGULATORY VOC CONTENT grams/liter (pounds/gallon)	
	Effective 7/1/2009	Effective 7/1/2010
Adhesion Promoter	840 (7.0)	540 (4.5)
Clear Coating	250 (2.1)	250 (2.1)
Color Coating	420 (3.5)	420 (3.5)
Multi-Color Coating	680 (5.7)	680 (5.7)
Pretreatment Coating	660 (5.5)	660 (5.5)
Primer	250 (2.1)	250 (2.1)
Primer Sealer	340 (2.8)	250 (2.1)
Single-Stage Coating	420 (3.5)	340 (2.8)
Temporary Protective Coating	60 (0.5)	60 (0.5)
Truck Bed Liner Coating	310 (2.6)	310 (2.6)
Underbody Coating	430 (3.6)	430 (3.6)
Uniform Finish Coating	540 (4.5)	540 (4.5)
Any Other Coating Type	250 (2.1)	250 (2.1)

In lieu, of complying with the VOC content limits of Section 302, a person may use a VOC emission control system that controls emissions from the

source operation provided the following condition are met: [District Rule 2.26, §305]

a. The VOC emission control system is approved in writing by the APCO,
b. The VOC emission control system shall be operated with an overall capture and control efficiency of at least 85 percent by weight during periods of emission producing activity.

The District Rule 3.4 requirement in P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth) is that all painting shall be performed in the paint booth with the control system operating and the control system shall have an abatement efficiency of at least 95%. The rule 3.4 requirement is more stringent than the rule 2.26 requirements.

The Rule 2.26 requirements are streamlined by the New Source Review requirement.

Streamlining Demonstration

One requirement of Rule 2.26 and Rule 2.31 can be streamlined by conditions required by District Rule 2.34 (New Source Review). The streamlining demonstration for storage and disposal is shown below:

Streamlined Requirements: All VOC-containing materials used shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying and disposed in a manner to prevent evaporation of VOCs to the atmosphere at the facility [District Rule 2.26, §302]. Rule 2.31 has the same requirements for VOC-containing materials used for surface preparation and cleanup. The Rule 2.34 requirement on the permit will specify the Permit Holder store all VOC-containing material used in the coating operation (including coatings, catalysts, thinners, reducers and solvents) non-absorbent, non-leaking containers kept closed at all time except for filling or emptying, and use closed containers for the disposal of cloth, paper or other VOC laden material.

The Rule 2.26 and Rule 2.31 requirements are streamlined by the New Source Review requirement.

Permit Conditions
P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth)

The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment or their parts and components unless electrostatic or high volume

low pressure (HVLP) application equipment is used. [District Rule 2.26, §304]

The Permit Holder shall maintain a daily log of coating use for P-108-91(a1) and P-23-93(a1) combined. This log shall include coating category, coating name, amount of each coating used, and VOC contents as applied for each coating, corresponding VOC emissions. [District Rule 2.26, §501]

RULE 2.27 Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters

Rule Description

The purpose of this rule is to provide a control measure to limit emissions of NOx from industrial, institutional, and commercial boilers, steam generators, and process heaters in conformance with BARCT determinations approved by the California Air Resources Board to meet the requirements of the California Clean Air Act.

Compliance Status

There are process heaters on the following permit units: P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth). Each of these heaters is less than 5 MMBtu/hr heat input and are, therefore, exempt from this rule pursuant to section 102 of the rule.

Permit Condition

No permit conditions are required.

RULE 2.31 Surface Preparation and Cleanup

Rule Description

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from surface preparation and cleanup, and from the storage and disposal of materials used in surface preparation and cleanup.

Compliance Status

This Rule is applicable to P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth). The facility is in compliance with the requirements of the rule.

Streamlining Demonstration

One requirement of Rule 2.26 and Rule 2.31 can be streamlined by conditions required by District Rule 2.34 (New Source Review). The streamlining demonstration for storage and disposal is shown below:

Streamlined Requirements: All VOC-containing materials used shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying and disposed in a manner to prevent evaporation of VOCs to the atmosphere at the facility [District Rule 2.26, §302]. Rule 2.31 has the same requirements for VOC-containing materials used for surface preparation and cleanup. The Rule 2.34 requirement on the permit will specify the Permit Holder store all VOC-containing material used in the coating operation (including coatings, catalysts, thinners, reducers and solvents) non-absorbent, non-leaking containers kept closed at all time except for filling or emptying, and use closed containers for the disposal of cloth, paper or other VOC laden material.

The Rule 2.26 and Rule 2.31 requirements are streamlined by the New Source Review requirement.

Permit Conditions

P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth)

The maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment, without the use of the RCCO, shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 2.31, §301 and §307]

The Permit Holder shall not use organic compounds, with a VOC content greater than 25 g/l, for the cleanup of spray equipment, without the use of the RCCO, unless the spray equipment is disassembled and cleaned in an enclosed gun washer or other low emission washing system that has been demonstrated to be at least equivalent to an enclosed system. [District Rule 2.31, §306 and §307]

RULE 3.1 General Permit Requirements (Adopted 2/23/94)

Rule Description

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status

The source is currently in compliance with the rule.

Permit Conditions

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1 § 301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1 § 302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1 § 302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1 § 405.3]

P-108-91(a1) (painting - R&R booth) and P-23-93(a1) (painting - main booth)

The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-09-143 &C-09-144]

The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day, while the booth is operating,

and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall develop a quality assurance and control practices guideline for operation of the RCCO, prior to issuance of the Permit to Operate. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall maintain daily records showing the type, name, and amount of solvent used for cleanup and surface preparation. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 &C-09-144]

All required records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rule 3.1, §402/C-09-143 &C-09-144]

RULE 3.4 New Source Review (Revised 8/13/97)

Rule Description

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to Rule 3.1, GENERAL PERMIT REQUIREMENTS, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

Compliance Status

The source has satisfied the provisions of New Source Review. The New Source Review requirements were imposed on the most recent Authority to Construct issued to the source. The New Source Review Requirements are shown below:

Permit Conditions

Emission Limits For Permit Unit

P-108-91(a3)
VOC emissions shall not exceed 112.2 lb/day, 6,902 lb/1st calendar quarter, 6,978 lb/2nd calendar quarter, 7,055 lb/3rd calendar quarter, 7,055 lb/4th calendar quarter, and 10.00 tons/year. [District Rule 3.4/C-09-143]

CO emissions shall not exceed 4.8 lb/day, 435 lb/1st calendar quarter, 440 lb/2nd calendar quarter, 445 lb/3rd calendar quarter, 445 lb/4th calendar quarter, and 0.88 tons/year. [District Rule 3.4/C-09-143]

NOx emissions shall not exceed 5.8 lb/day, 2, 518 lb/1st calendar quarter, 524 lb/2nd calendar quarter, 530 lb/3rd calendar quarter, 530 lb/4th calendar quarter, and 1.05 tons/year. [District Rule 3.4/C-09-143]

SOx emissions shall not exceed 0.0 lb/day, 3 lb/1st calendar quarter, 3 lb/2nd calendar quarter, 3 lb/3rd calendar quarter, 3 lb/4th calendar quarter, and 0.01 tons/year. [District Rule 3.4/C-09-143]

PM10 emissions shall not exceed 5.8 lb/day, 370 lb/1st calendar quarter, 376 lb/2nd calendar quarter, 382 lb/3rd calendar quarter, 382 lb/4th calendar quarter, and 0.75 tons/year. [District Rule 3.4/C-09-143]

P-23-93(a1)
VOC emissions shall not exceed 112.2 lb/day, 6,903 lb/1st calendar quarter, 6,979 lb/2nd calendar quarter, 7,056 lb/3rd calendar quarter, 7,056 lb/4th calendar quarter, and 10.00 tons/year. [District Rule 3.4/C-09-144]

CO emissions shall not exceed 8.9 lb/day, 798 lb/1st calendar quarter, 807 lb/2nd calendar quarter, 816 lb/3rd calendar quarter, 816 lb/4th calendar quarter, and 1.62 tons/year. [District Rule 3.4/C-09-144]

NOx emissions shall not exceed 10.6 lb/day, 950 lb/1st calendar quarter, 961 lb/2nd calendar quarter, 972 lb/3rd calendar quarter, 972 lb/4th calendar quarter, and 1.93 tons/year. [District Rule 3.4/C-09-144]

SOx emissions shall not exceed 0.1 lb/day, 6 lb/1st calendar quarter, 6 lb/2nd calendar quarter, 6 lb/3rd calendar quarter, 6 lb/4th calendar quarter, and 0.01 tons/year. [District Rule 3.4/C-09-144]

PM10 emissions shall not exceed 6.2 lb/day, 403 lb/1st calendar quarter, 409 lb/2nd calendar quarter, 415 lb/3rd calendar quarter, 415 lb/4th calendar quarter, and 0.82 tons/year. [District Rule 3.4/C-09-144]

Throughput Limits for Permit Unit

For the coating processes and related activities operating under P-108-91(a3) and P-23-93(a2), total coating related VOC emissions for both booths shall not exceed 112 lb/day, 6,885 lb/1st calendar quarter, 6,961 lb/2nd calendar quarter, 7,038 lb/3rd calendar quarter, 7,038 lb/4th calendar quarter, and 9.96 tons/year. [District Rule 3.4/C-09-143 & C-09-144]

For the processes operating under P-108-91(a3), the maximum amount of natural gas fuel consumed for all burners shall not exceed 0.06 million cubic feet/day, 5.18 million cubic feet/1st calendar quarter, 5.24 million cubic feet/2nd calendar quarter, 5.30 million cubic feet/3rd calendar quarter, 5.30 million cubic feet/4th calendar quarter, 21.02 million cubic feet/year. [District Rule 3.4/C-09-143]

For the processes operating under P-23-93(a2), the maximum amount of natural gas fuel consumed for all burners shall not exceed 0.11 million cubic feet/day, 9.50 million cubic feet/1st calendar quarter, 9.61 million cubic feet/2nd calendar quarter, 9.72 million cubic feet/3rd calendar quarter, 9.72 million cubic feet/4th calendar quarter, 38.54 million cubic feet/year. [District Rule 3.4/C-09-144]

Applicable Requirements for Permit Unit

For the coating processes and related activities operating under C-09-143 and C-09-144, total coating related VOC emissions for both booths shall not exceed 111.8 lb/day, 6,885 lb/1st calendar quarter, 6,961 lb/2nd calendar quarter, 7,038 lb/3rd calendar quarter, 7,038 lb/4th calendar quarter, and 9.96 tons/year. [District Rule 3.4/C-09-143 and C-09-144]

For the processes operating under C-09-143 and C-09-144, the maximum amount of natural gas fuel consumed for all burners shall not exceed 0.13 million cubic feet/day, 11.66 million cubic feet/1st calendar quarter, 11.79 million cubic feet/2nd calendar quarter, 11.92 million cubic feet/3rd calendar quarter, 11.92 million cubic feet/4th calendar quarter, 47.30 million cubic feet/year. [District Rule 3.4]

A non-resettable, totalizing gaseous fuel flow meter shall be installed and utilized to measure the quantity (in cubic feet) of natural gas combusted. [District Rule 3.4/C-09-143 and C-09-144]

For the coating processes and related activities operating under C-09-62 and C-09-63, when determining compliance with the daily, quarterly, and yearly

permitted process VOC limit, the source shall use the following equation [District Rule 3.4/C-09-143 and C-09-144]:

$$\sum((OB \times OBvoc) + (IB \times IBvoc \times (1-CE/100)) = \text{VOC from coating processes (lbs)}$$

where:

OB = amount of solvent (or other material) used outside booths (gallons)
OBvoc = VOC content of (OB) material used (lb/gallon)
CE = control efficiency of RCCO = 95%
IB = amount of paint (or other material) used inside booth (gallons)
IBvoc = VOC content of (IB) material used (lb/gallon)

The Permit Holder shall not discharge into the atmosphere, from the control equipment exhaust, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4/C-09-143 and C-09-144]

The maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment, without the use of the RCCO, shall not exceed 50g/l (0.42 lb/gallon). [District Rule 3.4/C-09-143 and C-09-144]

The permit holder shall store all VOC-containing materials used in the coating operation (including coatings, catalysts, thinners, reducers and solvents), in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying.

The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The catalytic oxidizer shall operate at a minimum temperature of 550° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The pressure differential in the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4/C-09-143 and C-09-144]

All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent

painting without the RCCO operating. [District Rule 3.4/C-09-143 and C-09-144]

The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth, as determined by required source testing. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall perform a source test at least once every 24 consecutive months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4/C-09-143 and C-09-144]

Ongoing source testing shall be conducted using the following test methods [District Rule 3.4/C-09-143 and C-09-144]:

1. Flow Rate - EPA Methods 1 & 2;
b. Stack gas oxygen - EPA Method 3A, or CARB Method 100;
3. VOC - EPA Method 25 (inlet prior to adsorber and outlet at stack)

The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4/C-09-143 and C-09-144]

The paint booths must be maintained as Permanent Total Enclosures (PTE), as specified in EPA method 204. The natural draft opening sizes and locations shall be verified and documented during the start up period and shall be verified at least once every 12 calendar months. [District Rule 3.4/C-09-143 and C-09-144]

RULE 3.8 Federal Operating Permits (Revised 4/11/01)

Rule Description

This Rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

Compliance Status

The source is in compliance with the requirements of this rule. The source was issued an initial Title V operating permit on June 26, 1998, and a renewed permit was issued on September 10, 2004. The source currently

has one proposed change for which the District is issuing an Authority to Construct, which is being processed according to the District's Enhanced New Source Review (NSR) guidelines in District Rule 3.4, Section 404.

The proposed change is a minor permit modification (District Rule 3.8, section 222) because the proposed changes are not classified as either an administrative or significant modification. The modification involves a change in the process description and incorporates the changes to the applicable District rules that were amended since the last permit modification.

Upon implementation of the District ATC into a Permit to Operate (PTO), the source may submit a written request for District action to amend the Title V operating permit pursuant to District Rule 3.8, section 404.2. Since the District ATC has been processed according to enhanced NSR guidelines, upon written request by the source, the District shall incorporate the changes into the Title V permit as an administrative permit amendment pursuant to District Rule 3.8, section 412.1.

Permit Conditions

Right of Entry:

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
b. Inspection and duplication of records required by the permit to operate; and
c. Source sampling or other monitoring activities. [Rule 3.8 § 302.10]

Compliance with Permit Conditions:

The permittee shall comply with all Title V permit conditions. [Rule 3.8 § 302.11a]

The permit does not convey property rights or exclusive privilege of any sort. [Rule 3.8 § 302.11b]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [Rule 3.8 § 302.11c]

The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [Rule 3.8 § 302.11d]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [Rule 3.8 § 302.11e]

Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:

a. Compliance with the permit; or
b. Whether or not cause exists for a permit or enforcement action. [Rule 3.8 § 302.11f]

Emergency Provisions:

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

(i) An emergency occurred;
(ii) The permittee can identify the cause(s) of the emergency;
(iii) The facility was being properly operated at the time of the emergency;
(iv) All steps were taken to minimize the emissions resulting from the emergency; and
(v) Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. [District Rule 3.8 § 302.12]

Severability

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [Rule 3.8 § 302.13]

Compliance Certification

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [Rule 3.8 § 302.14a]

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [Rule 3.8 § 302.14b]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [Rule 3.8 § 302.14c]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [Rule 3.8 § 302.14d]

Permit Life:

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [Rule 3.8 § 302.15]

Payment of Fees:

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [Rule 3.8 § 302.16]

Permit Revision Exemption:

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [Rule 3.8 §302.22]

Application Requirements:

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [Rule 3.8 § 402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [Rule 3.8 § 402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
b. Proposed permit terms and conditions; and
c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [Rule 3.8 § 402.4]

Permit Reopening for Cause:

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

a. The need to correct a material mistake or inaccurate statement;
b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [Rule 3.8 § 413.1]

Recordkeeping:

The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

(i) Date, place, and time of sampling;
(ii) Operating conditions at the time of sampling;
(iii) Date, place, and method of analysis; and
(iv) Results of the analysis. [District Rule 3.8 § 302.6a]

The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8 § 302.6b]

Reporting Requirements:

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[Rule 3.8 § 302.7a]

A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of Rule 3.8. [Rule 3.8 § 302.7b]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [Rule 3.8 § 302.7c]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [Rule 3.8 § 302.7e]

RULE 3.13 Toxics New Source Review

Rule Description

The purpose of this Rule is to require installation of best available control technology for toxics (T-BACT) at any constructed or reconstructed major source of hazardous air pollutants.

Compliance Status

This source is exempt from the provisions of this rule pursuant to section 102 of the Rule. The source is not constructing or reconstructing a major source.

Permit Condition

No permit conditions are required.

40 CFR Part 63, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products

Rule Description

The purpose of this rule is to control hazardous air pollutant (HAP) emissions from the surface coating of miscellaneous metal parts and products.

Compliance Status

This subpart is applicable to the facility because it is applicable to all facilities that perform surface coating of miscellaneous metal parts and products, and are a major source of HAPs. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. [40CFR63 Subpart MMMM]

40 CFR Part 63, Subpart PPPP - National Emission Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products

Rule Description

The purpose of this rule is to control hazardous air pollutant (HAP) emissions from the surface coating of plastic parts and products.

Compliance Status

This subpart is applicable to the facility because it is applicable to all facilities that perform surface coating of plastic parts and products, and are a major source of HAPs. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. [40CFR63 .Subpart PPPP]

40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

Rule Description

This subpart provides guidelines for developing a compliance assurance monitoring plan. This plan is a way to ensure that facilities will monitor the appropriate parameters, relating to emissions and control equipment, to ensure that compliance is maintained on an ongoing basis.

Compliance Status

This subpart is applicable to facilities with an emissions unit that is subject to an emission limitation or standard for a pollutant where the unit uses an add-on control device to achieve compliance with the emission limitation, and the unit has a pre-control device potential to emit that is equal to or greater than the major source threshold for that pollutant. This subpart is applicable to one operation for one pollutant at this source.

The only pollutant at this facility that is greater than the major source threshold is VOC. The facility is proposing to install a rotor concentrator catalytic oxidizer (RCCO) to control the emissions that occur in the paint booths and mix room at the facility. There is a mix room where the paint is dispensed and mixed by computer, according to preset formulas. There are two paint booths where the actual painting occurs, the main paint booth and the repair and rework booth. All of the emissions from these areas would be ducted to the control system. The surface prep emissions that occur outside of the booths can not be controlled and are still counted as part of the total emissions for the permit units. The equation for calculating actual emissions takes this into account. The two District permits that cover this equipment have both emissions and throughput caps.

The unit is subject to the proposed 10.00 ton emission limitation by a New Source Review permit condition, the unit uses a control device to achieve compliance with this permit condition, and the unit has a pre-control device potential to emit above the major source threshold for VOC. Therefore, this subpart is applicable to the painting operation at this facility.

The facility has proposed to continuously monitor and record the rotor concentrator desorption air temperature, and the catalytic oxidizer combustion chamber temperature. The facility has also proposed biannual source testing using EPA method 25 to verify that the minimum 95% control efficiency is accomplished. The critical set point for the desorption temperature is 300 degrees F. The critical set point for the catalytic oxidizer

is 550 degrees F. If a critical set point is reached by the system, a programmable controller shuts both the RCCO and painting system down. The RCCO is interlocked with the air flow to the paint guns so that if a critical fault (or any other cause) shuts the RCCO down, spraying may not be continued.

There are three design criteria conditions and four performance criteria conditions listed under section 64.3 of the subpart (monitoring and design criteria) that must be met by the CAM plan. The first design criteria is that the monitoring system must be designed to obtain data for one or more indicators of emissions control performance for the control device. As described above, the facility is proposing to continuously monitor multiple critical temperatures on the control unit to ensure that the unit continues to maintain the minimum control efficiency. The facility will also be required to do a VOC destruction efficiency test every two years to verify the minimum 95% control efficiency of the RCCO. The facility will also monitor the booths to ensure that they continue to meet the definition of permanent total enclosure. These items meet the requirement that the monitoring system obtain data for one or more indicators of emissions control performance.

The second design criteria is that the facility establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations for the anticipated range of operating conditions. The facility must show that the selected indicators show a reasonable assurance of compliance with the 95% control efficiency requirement. The most important set point to assure this is the catalytic oxidizer minimum temperature set point. The online mode computer set point for the oxidizer is 700 degrees F, but the minimum threshold is 550 degrees F, as set by permit condition. The facility has proposed a continuous temperature recorder for this point to show compliance with this temperature threshold and has proposed that the painting system be automatically shut down at any time that the temperature drop below this point. The only exception to this is the option of a standby mode, where the system can be placed in standby with the oxidizer at 400 degrees, but the spray system is inoperable. This is so that the oxidizer may be maintained at a temperature so that it won't need to be re-heated while the system may not be in operation for a period of time during the work shift. The facility will be required to keep records from this continuous temperature recorder and records of shut downs. The next set point that the facility has proposed to monitor in the same fashion is the rotor concentrator desorption temperature. This temperature is important to ensure that the VOCs are being fully desorbed from the zeolite wheel. This ensures that the wheel has full capacity to adsorb VOCs on the next rotation around. The on-line mode temperature of

the desorption unit is 360 degrees F, but the minimum temperature fault threshold is 300 degrees F. This point will also have a continuous temperature recorder and will be handled in the same way as the oxidizer, as described above. Part two also requires that the operator monitor indicators to detect a bypass of the control device, if such a bypass can occur. The applicant will monitor to be sure that the control device does, in fact, shut down when the specified temperatures reach the fault thresholds.

The third design criteria requires that the design of indicator ranges may be based on a single maximum or minimum value, expressed as a function of process variables, expressed as maintaining the applicable parameter in a particular operational status or designated condition, or established as interdependent between more than one indicator. This criteria is met because the proposed indicators values are based on a single minimum value.

The first performance criteria that must be met is that the specifications that provide for obtaining data that are representative fo the emissions or parameters being monitored. The system will be installed according to manufacturers specifications because the manufacturer is installing it. The temperature indicator locations are built in to the system before the system reaches the site and there is no way to change the temperature indicator locations. This criteria has been met.

The second performance criteria that must be met is that verification procedures must be conducted to confirm the operational status of the monitoring and should be done according to the manufacturers requirements or recommendations for installation, calibration, and start up operation. This criteria will be met because the manufacturer will verify the temperature monitoring devices prior to start up and the devices will also be verified during the source tests that are conducted initially and every two years after. This criteria will be met.

The third performance criteria that must be met is that quality assurance and control practices must be in place that are adequate to ensure the continuing validity of the data. There will be a condition requiring the facility to develop quality assurance and control practices prior to isuance of the Permit to Operate. This criteria will be met.

The fourth performance criteria that must be met is that specifications for the frequency of conducting the monitoring and data collecting procedures must be in place. The frequency for temperature logging is continuous, and the data collection is by automatic strip chart print out. For tracking faults and shut downs, the facility will manually record the date, time, and reason for the fault or shut down in a log. This criteria has been met.

Permit Condition

All conditions that satisfy the CAM requirements discussed in the section above have been required under either District Rule 3.1 or District Rule 3.4, New Source Review. These conditions specifically satisfy the CAM requirements and are shown below:

The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-09-143 &C-09-144]

The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall develop a quality assurance and control practices guideline for operation of the RCCO, prior to issuance of the Permit to Operate. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 &C-09-144]

The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The catalytic oxidizer shall operate at a minimum temperature of 550° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The pressure differential in the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4/C-09-143 and C-09-144]

All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4/C-09-143 and C-09-144]

The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth, as determined by required source testing. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall perform a source test at least once every 24 consecutive months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4/C-09-143 and C-09-144]

Ongoing source testing shall be conducted using the following test methods [District Rule 3.4/C-09-143 and C-09-144]:

1. Flow Rate - EPA Methods 1 & 2;
b. Stack gas oxygen - EPA Method 3A, or CARB Method 100;
3. VOC - EPA Method 25 (inlet prior to adsorber and outlet at stack)

The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4/C-09-143 and C-09-144]

The paint booths must be maintained as Permanent Total Enclosures (PTE), as specified in EPA method 204. The natural draft opening sizes and locations shall be verified and documented during the start up period and shall be verified at least once every 12 calendar months. [District Rule 3.4/C-09-143 and C-09-144]